

09/672,636

00AB151

---

**REMARKS**

Claims 1-29 are currently pending in the subject application and are presently under consideration. No claims have been amended herein. A clean version of all pending claims is found at pages 2-7 of this Reply.


Favorable reconsideration of the application is respectfully requested in view of the comments herein.

**I. Rejection of Claims 1, 15, and 29 Under 35 U.S.C. §102(b)**

Claims 1, 15, and 29 stand rejected under 35 U.S.C. §102(b) as being anticipated by Schaffstein *et al.* (U.S. Patent No. 6,140,994). It is submitted that this rejection should be withdrawn for at least the following reasons. Schaffstein *et al.* does not disclose each and every element as set forth in the subject claims.

For a prior art reference to anticipate, 35 U.S.C. §102 requires that "each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *In re Robertson*, 169 F.3d 743, 745, 49 USPQ2d 1949, 1950 (Fed. Cir. 1999) (quoting *Verdegaal Bros., Inc. v. Union Oil Co.*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)).

The present invention relates generally to the field of video displays and more particularly to an improved *raster engine with multi-mode programmable blinking*. (See, e.g., page 1, lines 4-6.) The claimed invention allows for finer grained *pixel* blinking control than was previously available using conventional character dot blinking methodologies. (See, e.g., page 18, lines 18-19.) Independent claim 1 of the subject application recites "*a raster engine adapted to receive video data from the frame buffer, to format the video data, and to render the formatted data to the display; and a hardware blink logic system operatively associated with the raster engine to selectively blink at least one pixel on the display.*" Independent claims 15 and 29 recite similar limitations. The raster engine of the subject claims "*is easily programmed to interface a computer system running a variety of application programs with a plurality of disparate display types.*" The invention can thus be employed in high end as well as highly cost sensitive computer system applications in



09/672,636

00AB151

association with displays *ranging from high definition television (HDTV) to low resolution monochrome EL and/or LCD display panels.*" (Page 4, lines 25-30.) The raster engine of the subject claims is capable of *formatting video data for rendering to a display.* (See, e.g., Claims 1, 15, and 29.) "In addition, the raster engine can further comprise an integrated digital to analog converter (DAC) to support analog LCD displays and CRTs." (Page 9, lines 11-12.) Moreover, "The raster engine 2...*provides for selective remapping of the pixel data from the frame buffer format to a format appropriate* for interfacing to a selected display device type, without requiring rerouting of signal outside of the raster engine." (Page 22, lines 8-11.) Schaffstein *et al.* does not disclose such aspects of the present invention as set forth in the subject claims.

Schaffstein *et al.* merely discusses a system wherein a multiplexer (MUX) 20 either passes or blocks an input signal 22, 24 based on the presence of a select signal 38. Such select signal 38 is generated based in part on a raster operation (ROP) code 90. However, an ROP code is merely a binary value (1 for true, 0 for false) that can be ANDed with a key code combination 86 to cause a select signal generator 50 to send an appropriate select signal 38 to the MUX 20, which will then *merely pass or block a particular input signal.* The ROP code is *not a raster engine* as claimed in the subject claims and supported by the subject specification. Furthermore, there is no indication or suggestion whatsoever in Schaffstein *et al.* of a raster engine that can receive input data from a frame buffer and *format* such data in any manner for transmission to a particular display device. Rather, input is merely permitted to pass or is not permitted to pass to the display device *via* the MUX, but it is *not formatted or altered in any way from its original state* (e.g., its state upon leaving the frame buffer 26).

Therefore, it is readily apparent that Schaffstein *et al.* does not anticipate or make obvious applicants' claimed invention as set forth in independent claims 1, 15, and 29. Accordingly, withdrawal of this rejection is respectfully requested.

## II. Rejection of Claims 2-6, 8, 9, 11-13, 16-20, and 22-24 Under 35 U.S.C. §103(a)

Claims 2-6, 8, 9, 11-13, 16-20, and 22-24 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Schaffstein *et al.* in view of Fleming *et al.* (U.S. Patent No. 4,439,759). It is submitted that this rejection should be withdrawn for at least the following

09/672,636

00AB151

reasons. Neither Schaffstein *et al.* nor Fleming *et al.*, alone or in combination, teach or suggest every limitation set forth in the subject claims.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) **must teach or suggest all the claim limitations**. See MPEP §706.02(j). The **teaching or suggestion to make the claimed combination** and the reasonable expectation of success **must both be found in the prior art and not based on applicant's disclosure**. See *In re Vaack*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991) (emphasis added).

Claims 2-6, 8, 9, 11-13, 16-20, and 22-24 depend directly or indirectly from independent claims 1, 15, and 29, which are believed to be allowable for the aforementioned reasons. Fleming, *et al.* does not make up for the aforementioned deficiencies of Schaffstein *et al.* with respect to claims 1, 15, and 29. Specifically, Fleming, *et al.* merely discusses a plurality of algorithms for blinking picture elements. Fleming *et al.* does not teach or suggest a *raster engine that formats data* for transmission to a display device.

Therefore, claims 2-6, 8, 9, 11-13, 16-20, and 22-24 are not obvious over the combination of Schaffstein *et al.* and Fleming *et al.* Accordingly, withdrawal of this rejection is respectfully requested.

### **III. Rejection of Claims 25-27 Under 35 U.S.C. §103(a)**

Claims 25-27 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Schaffstein *et al.* in view of Fleming *et al.*, and further in view of Wakeland *et al.* (U.S. Patent No. 5,258,836). It is submitted that this rejection should be withdrawn for at least the following reasons. Neither Schaffstein *et al.* nor Fleming, *et al.* nor Wakeland *et al.*, alone or in combination, teach or suggest every limitation set forth in the subject claims.

09/672,636

00AB151

Claims 25-27 depend indirectly from independent claim 15, which is believed to be allowable for the aforementioned reasons. Wakeland *et al.* does not make up for the deficiencies of Schaffstein *et al.* and Fleming, *et al.* with respect to independent claim 15. Specifically, Wakeland *et al.* does not teach or suggest a *raster engine* that receives data from a frame buffer and *formats such data for transmission* directly to a display device.

Therefore, withdrawal of this rejection is respectfully requested.

**IV. Rejection of Claims 7, 14, 21, and 28 Under 35 U.S.C. §103(a)**

Claims 7, 14, 21, and 28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Schaffstein *et al.* in view of Wise *et al.* (U.S. Patent No. 6,326,999). It is submitted that this rejection should be withdrawn for at least the following reasons. The subject claims depend respectively from independent claims 1 and 15, which, in view of the comments above in Section I, are not made obvious by Schaffstein *et al.*

Wise *et al.* fails to overcome the deficiencies of Schaffstein *et al.* with respect to independent claims 1 and 15. Specifically, Wise *et al.* does not teach or suggest a raster engine that receives data from a frame buffer and *formats such data for transmission* to a display device.

In view of at least the above, the cited prior art, taken alone or in combination, does not make obvious claims 1 and 15 (and claims 7, 14, 21, and 28, which depend respectively there from). Withdrawal of this rejection is respectfully requested.

**V. Rejection of Claim 10 Under 35 U.S.C. §103(a)**

Claim 10 stands rejected under 35 U.S.C. §103(a) as being unpatentable over Schaffstein *et al.* in view of Fleming *et al.*, and further in view of Shibata *et al.* (U.S. Patent No. 4,845,477). Withdrawal of this rejection is respectfully requested for at least the following reasons.

Claim 10 depends from independent claim 1, which, as stated above, is not made obvious by Schaffstein *et al.* or by Fleming *et al.*, alone or in combination. Shibata *et al.* fails to overcome the deficiencies of Schaffstein *et al.* and Fleming *et al.* with respect to independent claim 1. Specifically, Shibata *et al.* fails to teach or suggest a raster engine that

09/672,636

00AB151

formats data for transmission to a particular display device. Therefore, it is respectfully submitted that this rejection should be withdrawn.

**VI. Conclusion**

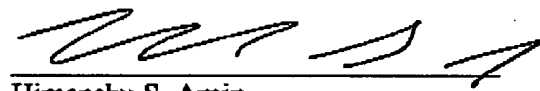
The present application is believed to be condition for allowance in view of the above comments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant's undersigned representative at the telephone number listed below.

Respectfully submitted,

AMIN & TUROCY, LLP



Himanshu S. Amin  
Reg. No. 40,894

24<sup>TH</sup> Floor, National City Center  
1900 E. 9<sup>TH</sup> Street  
Cleveland, Ohio 44114  
Telephone (216) 696-8730  
Facsimile (216) 696-8731